

Exhibit O

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ADREA, LLC,

Plaintiff,

v.

13-CV-4137 (JSR)

BARNES & NOBLE, INC.,
BARNESANDNOBLE.COM LLC, and NOOK
MEDIA LLC,

Defendants.

ADREA, LLC'S INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Adrea, LLC ("Adrea" or "Plaintiff") hereby submits the following disclosures to Barnes & Noble, Inc., barnesandnoble.com LLC, and Nook Media, LLC (collectively, "Defendants") based on information reasonably available to Adrea at this time. In so doing, Adrea does not intend to waive any objections, such as relevance or admissibility, or any applicable privileges, such as attorney-client or work product immunity. Adrea reserves the right to amend and/or supplement these disclosures as necessary and to rely on the testimony of any person, or documents, it subsequently identifies as relevant to this dispute.

Pursuant to Rule 26(a)(1) and other applicable Federal Rules of Civil Procedure, Adrea is not disclosing documents or information protected by the attorney-client privilege, work product immunity doctrine or any other applicable privilege. Adrea's disclosures do represent, however, a good faith effort by Adrea to identify information presently available to it that falls within the scope of Rule 26(a)(1). As such, these disclosures do not include information that may be used solely for impeachment purposes.

Adrea's disclosures are made without, in any way, waiving: the right to object on any and all grounds, at any time, to any discovery request involving or relating to the subject matter of these disclosures, or to the use of any such information, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action.

The disclosures set forth below are organized to correspond to the general categories set forth in Rule 26(a)(1) and are made subject to the above objections and qualifications.

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subject(s) of the information—that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

Based upon information reasonably available to Adrea at this time, Adrea identifies the following individuals likely to have discoverable information that Adrea may use to support its claims and defenses. Identification of an individual is not an affirmative assertion by Adrea that the individual has discoverable information, but rather, that the individual may have discoverable information. Moreover, the actual knowledge of persons identified herein may or may not exceed the scope of the subject matter that has been listed in the entries set forth herein, and is not a representation that the witness necessarily has all information on that subject matter. The individuals denoted by an asterisk (*) are represented by, and may not be contacted except through, the undersigned Plaintiff's counsel.

Name	Subject Matter
John S. Hendricks	U.S. Patent Nos. 7,298,851 B1 and 7,299,501 B2, including inventorship, conception, reduction to practice, diligence, prosecution, and related issues
Michael L. Asmussen	U.S. Patent No. 7,298,851 B1, including inventorship, conception, reduction to practice, diligence, prosecution, and related issues

Name	Subject Matter
John S. McCoskey	U.S. Patent No. 7,298,851 B1, including inventorship, conception, reduction to practice, diligence, prosecution, and related issues
Yevgeniy Eugene Shteyn*	U.S. Patent No. 7,620,703 B1, including inventorship, conception, reduction to practice, diligence, prosecution, and related issues
Wilburn L. Chesser Arent Fox LLP 1717 K Street, NW Washington, DC 20036 202.715.8434	Preparation and prosecution of the patent applications for U.S. Patent Nos. 7,298,851 B1 and 7,299,501 B2
Bradley M. Ganz Ganz Law, P.C. 163 SE 2nd Ave. P.O. Box 2200 Hillsboro, Oregon 97123 503.844.9009	Preparation and prosecution of the patent application for U.S. Patent No. 7,620,703 B1
Robert M. McDermott, Esq. 804.493.0707	Preparation and prosecution of the patent application for U.S. Patent No. 7,620,703 B1
Brian S. Myers Myers Wolin, LLC 100 Headquarters Plaza North Tower, 6th Floor Morristown, NJ 07960 973.401.7157	Preparation and prosecution of the patent application for U.S. Patent No. 7,620,703 B1
Jeffery Jay McDow*	Ownership of, infringement of and licensing and enforcement activities concerning, U.S. Patent Nos. 7,298,851 B1, 7,299,501 B2 and 7,620,703 B1 (“Patents-in-Suit”)
Talal Shamoon*	Ownership of, infringement of and licensing and enforcement activities concerning, the Patents-in-Suit
William Ernest Rainey III*	Ownership of, infringement of and licensing and enforcement activities concerning, the Patents-in-Suit
Shawn Durga Ambwani*	Infringement of and licensing activities concerning the Patents-in-Suit

In addition, Adrea expects to discover additional witnesses, whose specific identities are not yet known, to support its claims or defenses, including but not limited to employees and/or former employees of Defendants or third parties who have knowledge that supports Adrea claims or defenses. The specific nature of that knowledge and the identity of those individuals are not yet known to Adrea, but will be identified through discovery. Adrea will identify any experts who will testify at trial in accordance with the scheduling order in this case and the Federal Rules of Civil Procedure. Adrea reserves the right to identify additional persons if it learns during the course of its investigation in this action that such additional persons have knowledge of discoverable information that Adrea may use to support its claims or defenses.

B. A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

Based on information reasonably available to Adrea at this time, Adrea describes below the documents, data compilations and tangible things that are in the possession, custody, and control of Adrea or its counsel that it may use to support its claims or defenses.

1. The Patents-in-Suit;
2. Prosecution history of the Patents-in-Suit;
3. Documents relating to ownership of the Patents-in-Suit;
4. Documents concerning Defendants' knowledge of the Patents-in-Suit;
5. Documents concerning Defendants' infringement of the Patents-in-Suit; and
6. Documents concerning damages associated with Defendants' infringement of the Patents-in-Suit, including but not limited to licensing-related documents.

By providing the foregoing description of documents, Adrea does not waive its right to withhold production of any document in its possession that is protected by the attorney-client

privilege, the work product immunity, or any other claim of privilege or immunity, or that Adrea is prohibited from producing under a confidentiality agreement, or where production of a such a document would be otherwise unlawful. Adrea expressly reserves the right to identify and use other documents in support of its claims or defenses if, during the course of litigation, such documents become known to Adrea.

C. A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Adrea seeks damages in the form of monetary compensation for Defendants' past and continuing infringement of the Patents-in-Suit. Additional information and discovery is required before Adrea is able to ascertain the extent of damages it has suffered due to Defendants' infringement because documents and information necessary for computation of such damages, costs, fees and expenses are currently unavailable to Adrea at this early stage of the case. However, generally, Adrea expects to seek compensation for any proven infringement in accordance with 35 U.S.C. § 284, which shall be no less than a reasonable royalty. Adrea anticipates that the amount of its damages will be the subject of expert testimony at trial. Adrea also claims entitlement to pre-judgment and post-judgment interest, treble damages for willful infringement, as well as costs and attorneys' fees pursuant to 35 U.S.C. § 285, as well as any other monetary remedies authorized by the law.

D. Any insurance agreement under which an insurer may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Adrea is unaware at this time of any insurance agreement under which an insurer may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy the judgment.

Dated: August 16, 2013

PROSKAUER ROSE LLP

/s/ Micah Miller

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*Motion for admission *pro hac vice* forthcoming

CERTIFICATE OF SERVICE

I, Micah Miller, the undersigned attorney hereby certify that on August 16, 2013, copies of the foregoing document were served by electronic mail upon:

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